

Christian K. Vogel (Va. Bar No. 75537)
LeClairRyan, A Professional Corporation
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
(804) 916-7198

Counsel for G&S Livingston Realty, Inc.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

_____)	
In Re:)	Chapter 11
)	
CIRCUIT CITY STORES, INC., et al.,)	Case No. 08-35653-KRH
)	
Debtors.)	(Jointly Administered)
_____)	

**MOTION FOR ADMISSION
PRO HAC VICE OF STEPHEN V. FALANGA**

Christian K. Vogel (“**Movant**”) hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing Stephen V. Falanga (“**Mr. Falanga**”), an attorney with the law firm of Connell Foley LLP, to appear pro hac vice in the referenced proceeding before the United States Bankruptcy Court for the Eastern District of Virginia (the “**Bankruptcy Case**”) to represent G&S Livingston Realty, Inc., and in support of this Motion, the Movant states as follows:

1. Movant is a member in good standing of the Bar of the Supreme Court of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

2. Mr. Falanga is a member of good standing of the State Bars of New Jersey, New York, and the District of Columbia and is an attorney admitted to practice before the United States Supreme Court, United States District Court for the District of New Jersey, United States District Court for the Eastern District of New York, United States District Court for the Southern District of New York, and the United States Third Circuit Court of Appeals. There are no disciplinary proceedings pending against Mr. Falanga in any jurisdiction in which he is admitted to practice.

3. Movant requests that this Court authorize Mr. Falanga to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of G&S Livingston Realty, Inc.

4. Movant and his law firm shall serve as co-counsel with Mr. Falanga in the Bankruptcy Case (and related proceedings).

5. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) to counsel for the Debtor, and (c) all persons receiving electronic notice in the Bankruptcy Case as of the service hereof.

6. The Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2) is attached hereto as Exhibit A.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Stephen V. Falanga to appear pro hac vice in the Bankruptcy Case in substantially the same form as Exhibit B attached hereto and grant such other and further relief as is just.

/s/ Christian K. Vogel

Movant

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(804) 916-7198

Counsel for G&S Livingston Realty, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of April, 2013, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of Stephen V. Falanga was served on all persons receiving electronic notice in these cases, including:

Robert B. Van Arsdale
Office of the United States Trustee
701 East Broad St. Suite 4304
Richmond, Virginia 23219
Assistant United States Trustee

Stephen V. Falanga, Esq.
Connell Foley LLP
85 Livingston Avenue
Roseland, New Jersey 07068
Counsel for G&S Livingston Realty, Inc.

Lynn L. Tavenner
Tavenner & Beran, PLC
20 North Eighth Street, Second Floor
Richmond, Virginia 23219
Counsel for Liquidating Trustee

/s/ Christian K. Vogel

Movant

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA**

**APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER
LOCAL BANKRUPTCY RULE 2090-1(E)(2)**

In Case No.: 08-35653,* **Case Name** In Re: Circuit City Stores, Inc., et al.

PERSONAL STATEMENT

FULL NAME (no initials, please) Stephen Vincent Falanga
 Bar Identification Number 82036 State New Jersey
 Firm Name Connelly Foley LLP
 Firm Phone # 973-535-0500 Direct Dial # _____ FAX # 973-535-9217
 E-Mail Address sfalanga@connellyfoley.com
 Office **Mailing** Address 85 Livingston Avenue, Roseland, New Jersey 07068
 Name(s) of federal court(s) in which I have been admitted U.S., DC, NJ, NY, D.N.J., EDNY, SDNY, Third Circuit

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.

Stephen Falaya
(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

/s/ Christian K. Vogel
(Signature)

April 15, 2013
(Date)

Christian K. Vogel
(Typed or Printed Name)

**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.

Court Use Only:

The motion for admission is GRANTED *or* DENIED

(Judge's Signature) _____ (Date) _____

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Counsel for G&S Livingston Realty, Inc.

IN THE UNITED STATES BANKRUPTCY COURT
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_____)	
In Re:)	Chapter 11
)	
CIRCUIT CITY STORES, INC., et al.,)	Case No. 08-35653-KRH
)	
Debtors.)	(Jointly Administered)
_____)	

**ORDER GRANTING MOTION FOR
ADMISSION PRO HAC VICE OF STEPHEN V. FALANGA**

The matter came before the Court upon the Motion for Admission Pro Hac Vice of Stephen V. Falanga (the “**Motion**”) filed by Christian K. Vogel, seeking admission pro hac vice for Stephen V. Falanga, of the law firm of Connell Foley LLP, in the above-styled bankruptcy case (the “**Bankruptcy Case**”) pursuant to local Bankruptcy Rule 2090-1(E). After review of the Motion and statements therein, the Court finds that adequate notice of the Motion has been provided, no other or further notice is necessary or required, and it is appropriate that Stephen V. Falanga be authorized to practice pro hac vice before the Court in this Bankruptcy Case, it is hereby

ORDERED as follows:

1. The Motion be and hereby is granted.

2. Stephen V. Falanga, of the law firm of Connell Foley LLP, is hereby admitted to appear in this Bankruptcy Case and any related proceedings pro hac vice pursuant to Local Bankruptcy Rule 2090-1(E)(2) on behalf of G&S Livingston Realty, Inc.

ENTERED:

UNITED STATES BANKRUPTCY JUDGE

I ASK FOR THIS:

Christian K. Vogel (Va. Bar No. 75537)
LeClairRyan, A Professional Corporation
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
(804) 916-7198

Counsel for G&S Livingston Realty, Inc.

RULE 9022-1 CERTIFICATION

I hereby certify that the foregoing has either been endorsed by or served upon all necessary parties.

Movant

SERVICE LIST

Robert B. Van Arsdale
Office of the United States Trustee
701 East Broad St. Suite 4304
Richmond, Virginia 23219
Assistant United States Trustee

Stephen V. Falanga, Esq.
Connell Foley LLP
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20 North Eighth Street, Second Floor
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